

1 Chad C. Butterfield, Esq.  
2 Nevada Bar No. 10532  
3 **WILSON, ELSER, MOSKOWITZ,  
4 EDELMAN & DICKER LLP**  
5 6689 Las Vegas Blvd. South, Suite 200  
6 Las Vegas, NV 89119  
7 Tel: 702.727.1400; Fax: 702.727.1401  
8 [Chad.Butterfield@wilsonelser.com](mailto:Chad.Butterfield@wilsonelser.com)  
9 *Attorneys for Plaintiffs Allied  
10 World Specialty Insurance  
11 Company and Allied World  
12 Insurance Company*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

10 ALLIED WORLD SPECIALTY INSURANCE  
COMPANY f/k/a DARWIN NATIONAL  
ASSURANCE COMPANY, *et al.*,

Plaintiffs,

V.

13 LISA M. LEE, as Special Administrator of the  
14 ESTATE OF DEMETRIOS A. DALACAS,  
ESQ., *et al.*

## Defendants.

| Case No.: 2:21-cv-00078-JCM-EJY

**JOINT MOTION FOR EXTENSION OF TIME FOR PLAINTIFFS TO FILE OPPOSITION TO DEFENDANT RYAN MCCLARAN'S MOTION TO ABSTAIN AND TO DISMISS PLAINTIFFS' COMPLAINT**

**(First Request)**

17 Plaintiffs Allied World Specialty Insurance Company f/k/a Darwin National Assurance  
18 Company (“Allied World Specialty”) and Allied World Insurance Company (“Allied World  
19 Insurance” and collectively with Allied World Specialty, “Allied World”) and defendant Ryan  
20 McClaran (“McClaran”) jointly move this Court for an extension of time for Plaintiffs to file their  
21 opposition brief in response to defendant McClaran’s motion to abstain and to dismiss the complaint  
22 (ECF No. 23), filed on April 16, 2021 (the “motion”), from the current deadline of April 30, 2021  
23 to May 21, 2021. This is the first request for an extension of time for Allied World to file its  
24 opposition to the motion.

25 This motion is submitted in accordance with LR IA 6-2 and LR 7-1, and is supported by  
26 good cause. On April 16, 2021, Allied World and defendants Joyce Sirianni (“Sirianni”) and Lisa  
27 M. Lee (“Lee”) filed a joint motion seeking an extension to May 7, 2021 for Sirianni and Lee to  
28 respond to Allied World’s complaint (ECF No. 25), which this Court granted (ECF No. 27). Allied

1 World anticipates defendants Sirianni and Lee will file a motion similar to defendant McClaran's  
2 motion to abstain and to dismiss. Allied World's opposition to any such motion would be due on  
3 May 21, 2021. Allied World seeks an extension of time to respond to defendant McClaran's motion  
4 such that Allied World can address concurrently defendant McClaran's motion and the anticipated  
5 motion from defendants Sirianni and Lee, which would both be due on May 21, 2021.

6       Based on the foregoing, Allied World and McClarlan respectfully request an Order extending  
7 the deadline for Allied World to file its opposition in response to defendant McClarlan's motion to  
8 May 21, 2021.

## **BREEDEN & ASSOCIATES, PLLC**

# WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

By: /s/ Adam J. Breeden

ADAM J. BREEDEN, ESQ.  
Nevada Bar No. 8768  
376 E. Warm Springs Road, Suite 120  
Las Vegas, Nevada 89119  
*Attorneys for Defendant Ryan McClaran*

By: /s/ Chad C. Butterfield

CHAD C. BUTTERFIELD, ESQ.  
6689 Las Vegas Blvd. South, Ste. 200  
Las Vegas, Nevada 89119  
*Attorneys for Plaintiffs Allied World  
Specialty Insurance Company and  
Allied World Insurance Company*

## IT IS SO ORDERED.

Dated this 30th day of April, 2021.

Leah J. Zouchal  
UNITED STATES MAGISTRATE JUDGE